

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-80116-CR-CANNON/McCabe

UNITED STATES OF AMERICA

vs.

RYAN WESLEY ROUTH,

Defendant.

_____ /

PARTIES' JOINT REPORT ON TRIAL STIPULATIONS

As directed by the Court (ECF No. 91), the parties submit the following Joint Report on Trial Stipulations.

On Tuesday, June 10, the Government provided defense counsel with a detailed list of proposed stipulations. The defense responded by agreeing to some stipulations, disagreeing on others, and suggesting possible agreement in the future as to several. The parties then exchanged emails in an effort to reach agreement on the topics as to which the defense suggested possible agreement. Attached to this report as Attachment A are stipulations as to which there is now agreement; this language will be modified to include exhibit numbers for presentation to the jury.

The defense wishes to caveat its stipulations regarding Routh's prior felony convictions and knowledge of those convictions by saying that it may also be requesting a possible limiting jury instruction (for purposes of the jury's consideration). The Government does not agree to such an instruction. The defense also wishes to say that it will consider further stipulations as possible.

The Government prepared, and circulated to defense counsel this morning, a draft joint Report, an attachment listing the topics of agreement, and two additional attachments it expected to file with this Report: a list of stipulations proposed by the Government which the defense has

rejected, and a list of proposed stipulations as to which the defense signaled some willingness to consider in the future. The Court's Order, ECF No. 91:7, issued December 23, 2024, says plainly: "A Joint Report on Trial Stipulations shall be filed on or before June 13, 2025, following meaningful conferral by the parties. **Any disagreements must be denoted separately.**" (emphasis added). The Defendant never raised any question about this requirement during the past six months, let alone moved to alter it. At 12:13 PM this afternoon, however, defense counsel emailed Government counsel unilaterally opposing the filing of a list denoting any disagreements. Based on certain statements by defense counsel in that email, which the Court must examine, the Government is unable to file the additional attachment it prepared "denot[ing] separately" the parties' disagreements, even though we believe it is explicitly required by this Court's Order and we remain ready to provide it. We expect to address this topic with the Court at the next hearing.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ John Shipley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk
of the Court using CM/ECF on June 13, 2025.

/s/ John Shipley
Assistant United States Attorney